



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733**

June 28, 2013

Dr. John Kipp
Fort Bliss Directorate of Public Works
Attention: IMBL-PWE (Kipp)
Building 624 Pleasonton Road
Fort Bliss, Texas 79916

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) for the Implementation of Energy, Water, and Solid Waste Sustainability Initiatives (Net Zero) at Fort Bliss, Texas and New Mexico prepared by the United States Army (Army). The purpose of the proposed action is to implement Net Zero initiatives at Fort Bliss to meet Army mandates for renewable energy production, water conservation, and solid waste reduction.

EPA rates the DEIS as "EC-2" i.e., EPA has "environmental concerns and requests additional information" in the Final EIS (FEIS). The EPA's Rating System Criteria can be found here: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. The "EC" rating is based on potential impacts to natural and cultural resources. The "2" indicates the DEIS does not contain sufficient analysis and information concerning environmental justice, water use, cultural resources, air impacts, and energy consumption. Detailed comments are enclosed with this letter which clearly identifies our concerns and the informational needs requested for incorporation into the Final EIS (FEIS). Responses to comments should be placed in a dedicated section of the FEIS and should include the specific location where the revision, if any, was made. If no revision was made, a clear explanation should be included.

EPA appreciates the opportunity to review the DEIS. Please send our office two copies of the FEIS, and an internet link, when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20004. Our classification will be published on the EPA website, www.epa.gov, according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. If you have any questions or concerns, I can be reached at 214-665-8006, or contact Keith Hayden of my staff at hayden.keith@epa.gov or 214-665-2133.

Sincerely,

A handwritten signature in blue ink, which appears to read "Rhonda Smith", is written over the typed name.

Rhonda Smith
Chief, Office of Planning
And Coordination

Enclosure

**DETAILED COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
IMPLEMENTATION OF ENERGY, WATER, AND SOLID WASTE SUSTAINABILITY
INITIATIVES (NET ZERO) AT FORT BLISS, TEXAS AND NEW MEXICO**

BACKGROUND: Fort Bliss is seeking to manage installation operations, material, and resources, with a goal of achieving Net Zero status for energy use, water use, and solid waste generation. A Net Zero energy installation produces as much energy on-site as it uses over the course of a year. A Net Zero water installation limits the consumption of water resources and returns water back to the same watershed from which it was withdrawn. A Net Zero waste installation reduces waste generation, reuses materials, and recovers waste streams so that the installation produces no landfill waste over the course of a year. The Army currently faces significant challenges in meeting its energy and water supply requirements, both domestically and abroad. Addressing these challenges is operationally necessary, financially prudent, and essential to Army mission accomplishment. Fort Bliss seeks to improve the installations long term sustainability through anticipated cost reductions; while improving quality of life, relationships with local communities, and preserving options for the Army's future.

AIR QUALITY

Environmental Consequences of Alternatives; page 3-12:

Fort Bliss is located in close proximity to the major population centers of El Paso, Texas and Ciudad Juarez, Chihuahua, Mexico. In order to reduce potential short-term air quality impacts associated with construction activities of the various alternatives, EPA asks the agencies responsible for the project implement the following recommendations.

Recommendations:

- The agencies responsible for the project should include a Construction Emissions Mitigation Plan and adopt this plan in the Record of Decision (ROD). In addition to all applicable local, state, or federal requirements, the EPA recommends that the following mitigation measures be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of NO_x, CO, PM, SO₂, and other pollutants from construction-related activities:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate at active and inactive sites during workdays, weekends, holidays, and windy conditions;
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions; and
- Prevent spillage when hauling material and operating non-earthmoving equipment and limit speeds to 15 miles per hour. Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Plan construction scheduling to minimize vehicle trips;

- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections;
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed;
- Consider use of construction equipment meeting EPA's Tier 4 engine standards. However, lacking availability of such non-road construction equipment that meets these standards, we would suggest use of EPA-verified particulate traps, oxidation catalysts and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site; and
- Consider alternative fuels and energy sources such as natural gas and electricity (plug-in or battery).

Administrative controls:

- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking;
- Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips; and
- Identify sensitive receptors in the project area, such as children, elderly, and infirmed, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).

Appendix C – Draft Air Quality Technical Study; page 3

This section states “the USEPA also has classified Doña Ana and Otero counties in New Mexico (40 CFR 81.332) for criteria pollutants. A portion of Doña Ana County (Anthony, New Mexico) is designated as moderate non-attainment for PM₁₀.” This section primarily discusses counties that are designated nonattainment or maintenance of National Ambient Air Quality Standards (NAAQS) in 40 CFR 81.332), whereas Otero county is currently designated as “Unclassifiable/Attainment” for all NAAQS, and is not included in the Doña Ana County/Anthony Quadrangle PM₁₀ “Nonattainment” designation.

Recommendation:

- Clarify the classification that is being referred to regarding Otero County.

ENERGY DEMAND AND GENERATION

Energy Supply; page 3-64

According to 2015 use estimates, both average energy and peak energy use are projected to double from 2010 usage. This estimate came from a bullet point contained in an August 2011 newsletter published by Fort Bliss. It is unclear what information the newsletter used to arrive at the 2015 energy use estimates.

Recommendation:

- Cite the information source or study used to calculate the 2015 energy estimates for Fort Bliss. Highlight the expected changes at fort Bliss that would cause energy use to double from 2010 - 2015.

SOCIOECONOMICS AND ENVIRONMENTAL JUSTICE

Alternative 3 – Water Reclamation Pipeline; page 3-126

The construction of a Water Reclamation Pipeline has the potential to raise major environmental justice issues. The DEIS makes conclusions regarding the potential impacts to low income or minority populations of Alternative 3, but does not provide analysis or information to support such a conclusion.

Alternative 4 – Waste to Energy Plant; page 3-128

The construction of a waste to energy (WTE) facility has the potential to raise major environmental justice issues. The proposed location of the WTE facility is adjacent to an identified Minority and Poverty Area (Figure 3-7). Some information is provided to support the conclusion regarding impacts to low income or minority communities; however, there is no relevant public health and industry data concerning the potential for exposure (direct, indirect, and cumulative) from WTE facility activities to human health or environmental hazards in the potentially affected populations.

The DEIS states that at least 100 fully loaded garbage trucks would be delivered daily for combustion to the WTE facility and another 30 trucks a day of ash would be leaving daily. The DEIS does not evaluate the potential for noise, odor, flies, debris and ash from truck traffic on minority or low income communities in proximity to the facility. The DEIS explains some economic benefits of Zero Net initiative, but does not describe whether the residents (particularly minority or poverty communities) adjacent or nearby would benefit from the project.

4.3.10 Socioeconomic and Environmental Justice Cumulative Impacts; page 4-33

The cumulative impacts chapter contains summary statements that are not supported with analysis, documentation, or information. For example, page 4-33 states “Since implementation of this alternative is not expected to have a disproportionately high and adverse human health or environmental effect on minority, low-income, or younger segments of the local population, it would not cause cumulative impacts for the purposes of environmental justice when considered with any other actions in the area”.

Recommendation:

- The Army should provide a more detailed level of analysis, particularly for Alternatives 3 and 4, potential cumulative impacts, and potential direct impacts. The analysis should include:
 - historical environmental stressors on these communities,
 - health impacts of past, present or reasonably foreseeable future actions, and
 - environmental and health impacts of the alternatives on identified environmental justice communities.

GENERAL COMMENTS

Consultation with Tribes

No documentation was provided in the DEIS showing the Army sent letters to Tribes, or their responses. Also, the document indicates that Tribes were identified and contacted for the limited purpose of National Historic Preservation Act (NHPA) discussion, or other concerns of a limited scope. Due to the nature of the project, it appears it could affect tribal resources (including natural resources), citizens or government services.

Recommendation:

- Send the DEIS to the following Tribes: Tonkawa Tribe of Oklahoma, the Wichita and Affiliated Tribes of Oklahoma, Cheyenne/Arapaho Tribes, Apache Tribe of Oklahoma, Ponca Tribe of Oklahoma, and Jicarilla Apache Tribe (New Mexico). These Tribes practice religious ceremonies similar to the Tribes already identified in the DEIS and may have a historical or cultural connection to the El Paso/Ft Bliss ROI. Similarly, the Arizona State Historic Preservation Officer (SHPO) and the Arizona Apache Tribes, such as, the White Mountain and San Carlos Apache should be contacted.
- Identify all potentially affected tribes, resources and tribal communities, potentially applicable treaties, laws, policies, legal responsibilities and duties. Contact and, as appropriate, initiate consultation with Tribes concerning the potential effects of the alternatives. Provide an appendix that includes letters sent from the Army to Tribes for the purposes of NHPA and consultation under E.O. 13175, and the responses from Tribes.

Other Consultations

Due to potential impacts to air quality, water quality and quantity, threatened and endangered species, migratory birds, and cultural, historical, and archeological resources; consultation with applicable local, regional, state, tribal, and federal agencies or governments is required.

Recommendation:

- In a dedicated section of the Final EIS include all correspondence between the Army and all applicable local, regional, state, tribal, and federal agencies or governments.

Affected Environment and Environmental Consequences; page 3-1

All of the alternatives are in the planning stage of development and implementation, and many details about each alternative need to be identified and assessed before the impacts of the alternatives can be adequately evaluated.

Recommendation:

- EPA recommends that analysis for each of the alternatives be provided in the form of a supplemental environmental analysis or tiered off of this DEIS. This would allow proper evaluation of, and comment on, the alternatives before progressing to the Final EIS stage.

Potential Mitigation and Monitoring; page 5-1

The best management practices (BMP's) and mitigation proposed in the DEIS are vaguely described and phrased in ways that diminish the certainty of their implementation. Phrases, such as, "could be used", "potentially", and "may be implemented" do not qualify as mitigation. Similarly, stating that BMP's will be used to lessen impacts; and then offering vague BMP's which are not linked to specific impacts is not mitigation.

Recommendation:

- The DEIS needs to definitively state what BMP's and mitigation measures will be implemented, and then relate those BMP's and mitigation measures to a potential impact.